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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE SANTANA AYON ARAGON, and
AURELIA AYON GUERRERO,

Defendants.

CASE NO. 2:22-CR-00178-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: May 18, 2023
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through their respective counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on May 18, 2023.
2. By this stipulation, defendants now move to continue the status conference until July 27, 2023, at 9:30 a.m., and to exclude time between May 18, 2023, and July 27, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes approximately 8,152 pages of documents, including investigative reports, text messages, transcripts of recorded communications, and other materials, as well as multiple undercover video and audio recordings. All of this discovery has been produced to counsel for defendant Ayon Aragon.

1 b) Defendant Ayon Guerrero made her initial appearance in this district on April 20,
2 2023, based on charges contained in a criminal complaint.

3 c) On May 4, 2023, the grand jury returned a superseding indictment, adding
4 defendant Ayon Guerrero to this case and adding new charges against defendant Ayon Aragon.

5 d) On May 11, 2023, the Court issued a protective order to regulate discovery for
6 defendant Ayon Guerrero. Now that the protective order is in place, the government is in the
7 process of producing substantial discovery to counsel for defendant Ayon Guerrero, consisting of
8 thousands of pages of reports and other documents, as well as numerous video and audio
9 recordings.

10 e) Counsel for defendants desire additional time to review the discovery, to conduct
11 factual investigation, to evaluate potential responses to the charges, to confer with their clients,
12 and to otherwise prepare for trial.

13 f) Counsel for defendants believe that failure to grant the above-requested
14 continuance would deny them the reasonable time necessary for effective preparation, taking into
15 account the exercise of due diligence.

16 g) The government does not object to the continuance.

17 h) Based on the above-stated findings, the ends of justice served by continuing the
18 case as requested outweigh the interest of the public and the defendants in a trial within the
19 original date prescribed by the Speedy Trial Act.

20 i) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
21 et seq., within which trial must commence, the time period of May 18, 2023 to July 27, 2023,
22 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
23 because it results from a continuance granted by the Court at defendants' request on the basis of
24 the Court's finding that the ends of justice served by taking such action outweigh the best interest
25 of the public and the defendant in a speedy trial.

26 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
27 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
28 must commence.

1 IT IS SO STIPULATED.

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4 Dated: May 12, 2023

PHILLIP A. TALBERT
United States Attorney

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6 /s/ DAVID W. SPENCER
DAVID W. SPENCER
Assistant United States Attorney

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9 Dated: May 12, 2023

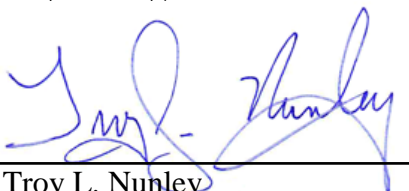
/s/ MEGHAN MCLOUGHLIN
MEGHAN MCLOUGHLIN
Counsel for Defendant
JOSE SANTANA AYON ARAGON

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12 Dated: May 12, 2023

/s/ CLEMENTE JIMENEZ
CLEMENTE JIMENEZ
Counsel for Defendant
AUREILIA AYON GUERRERO

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17 **ORDER**

18 IT IS SO FOUND AND ORDERED this 12th day of May, 2023.

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Troy L. Nunley
United States District Judge